

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

<b>LISA BROWN, M.D.,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	<b>Civil Action No. 05-32 E</b>
	)	
<b>HAMOT MEDICAL CENTER,</b>	)	
	)	
<b>Defendant.</b>	)	

**JOINT MOTION TO EXTEND DEADLINES**

The parties hereby move the Court for an additional extension of the discovery and motions deadlines, and state the following:

1. This is an action for employment discrimination and for breach of contract.
2. On or about December 13, 2005, the Court agreed to the parties' first request to extend the deadline for fact discovery to February 1, 2006 and to extend the deadline for filing dispositive motions to March 23, 2006.
3. Before the Court granted the parties' first request for an extension, and since that time, the parties have engaged in extensive discovery efforts. For example, Hamot has produced thousands of pages of documents, and counsel have taken several depositions. Additional discovery needs to be obtained by both sides, and additional depositions have been discussed by counsel, but have not yet been noticed. Some of the depositions remaining involve medical doctors who have rigid work schedules.
4. In addition, counsel are in disagreement over various discovery matters and have been unable to resolve their disputes. Thus, contemporaneous with the filing of this motion, defendant has filed a motion to compel discovery with the Court.

5. An extension of the discovery deadline for a period of forty-five (45) days following this Court's ruling on defendant's motion to compel is necessary for the parties to complete discovery.

Accordingly, the parties request that the Court grant their Joint Motion to Extend Deadlines. A proposed order is attached.

Respectfully submitted,

Tobin O'Connor Ewing & Richard

/s/ Kerry M. Richard  
Kerry M. Richard  
Ziad Haddad  
5335 Wisconsin Avenue, NW, Suite 700  
Washington, DC 20015  
202-362-5900  
Counsel for defendant

Leech Tishman Fuscaldo & Lampl, LLC

/s/ Patrick Sorek  
Patrick Sorek (Pa. ID No. 41827)  
525 William Penn Place, 30th Floor  
Pittsburgh, PA 15219  
(412) 261-1600  
Counsel for plaintiff